

total amount paid by the United States is the amount of \$800,000.00. \$600,000.00 of the settlement funds are allocated to the survival action, while \$200,000.00 of the funds are allocated to the wrongful death action.

5. Plaintiff is not aware of any claims filed against the estate.

6. Plaintiff, in her personal and representative capacity, agrees to release the United States from any and all liability as a result of the settlement.

7. From the settlement proceeds, the undersigned requests the approval of the court to pay for legal services rendered by her attorneys in the agreed amount of \$200,000.00 (25% of the total settlement) as well as costs in the amount of \$9,955.66. Plaintiff agrees the amount of \$5,000.00 should be held in trust by counsel for Plaintiff to satisfy any outstanding costs and probate fees associated with closing the estate once the settlement has been approved and funds distributed. Once all costs are satisfied and all fees have been satisfied with the probate court, any remaining funds left in trust will be distributed to Plaintiff, as the sole beneficiary of the Decedent's will. Plaintiff's undersigned and Plaintiff have contacted the probate court, and there are no pending claims against the estate. Plaintiff requests this court approve the settlement set forth herein.

8. The attorneys for Plaintiff shall receive \$200,000.00, as payment of attorney's fees, and the amount of \$9,955.66, as costs incurred during the representation of Plaintiff in this matter.

9. The amount of \$5,000.00 should be held in trust by counsel for Plaintiff to satisfy any outstanding costs and probate fees associated with closing the estate once the settlement has been approved and funds distributed. Once all fees have been satisfied with the probate court, any remaining funds left in trust will be distributed to Plaintiff, as the sole beneficiary of the Decedent's will.

10. The beneficiaries of the Decedent's estate are his wife, Plaintiff, and his two (2) children: Robert Keogh and Alissa Delucio.

11. Plaintiff should receive the following total amount from the survival action: \$438,783.26, plus any remaining money held in trust to close the estate.

12. Plaintiff, Robert Keogh, and Alissa Delucio should receive the following amounts from the wrongful death action: \$146,261.08, to be divided as follows:

a. Rachel Keogh: \$73,130.54

b. Robert Keogh: \$36,565.27

c. Alissa Delucio: \$36,565.27

13. Plaintiff has agreed to dismiss, with prejudice, all claims asserted in the lawsuit against the United States in this matter.

IT IS THEREFORE ORDERED, ADJUDGED, AND DECREED that the court approves the settlement proposal as presented herein.

The settlement is approved as stated and the court concludes this matter and forever forecloses any further action against the United States arising from the facts alleged in the Complaint (ECF No. 1) that the Decedent, Ralph M. Keogh, Jr., or his beneficiaries could have maintained and any other claims that were or could have been asserted in this lawsuit.

IT IS SO ORDERED.



United States District Judge

December 19, 2018
Columbia, South Carolina